

# SHAW KELLER

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**BY CM/ECF & HAND DELIVERY**

The Honorable Richard G. Andrews  
U.S. District Court for the District of Delaware  
844 N. King Street  
Wilmington, DE 19801

Re: *Finjan LLC v. Trustwave Holdings, Inc.*, C.A. No. 20-371-RGA

Dear Judge Andrews:

Plaintiff Finjan LLC (“Finjan”) and Defendant Trustwave Holdings, Inc. (“Trustwave”) write to provide a joint status report in accordance with the court’s March 11, 2022 oral order (D.I. 143).

Overview

Finjan filed the Original Complaint (D.I. 1) on March 16, 2020 and a First Amended Complaint (D.I. 28) on August 19, 2020. Trustwave filed its Answer and Counterclaim to Finjan’s First Amended Complaint (D.I. 36) on September 16, 2020. Finjan’s First Amended Complaint contained a patent infringement claim and breach of contract claim against Trustwave’s parent, Singapore Telecommunications Limited (“Singtel”). Singtel moved to dismiss (D.I. 31) or in the alternative stay (D.I. 64) Finjan’s claims. On October 29, 2021, the Court granted-in-part and denied-in-part Singtel’s motion to dismiss, dismissing the patent claim against Singtel, and granted Singtel’s motion to stay, staying the breach of contract claim against Singtel. (D.I. 117-118).

The Court entered its Scheduling Order on June 21, 2021. (D.I. 83). Since the Court entered its Scheduling Order, the parties commenced discovery and the claim construction process. The Joint Claim Construction Brief is due on March 31, 2022. (D.I. 125). The Claim Construction hearing is set for April 25, 2022.

Trial Date

Under the Scheduling Order (D.I. 83) trial is currently set for June 12, 2023. The parties seek to maintain the current schedule, or as close to the current schedule as possible given the Court’s calendar. The parties will work together on other dates to promptly submit a revised joint Scheduling Order once the Court confirms the above claim construction hearing and trial dates or advises of any modifications, if appropriate.

Counsel is available should the Court have any questions or concerns.

The Honorable Richard G. Andrews

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Respectfully submitted,

*/s/ Andrew E. Russell*

Andrew E. Russell (No. 5382)

cc: Clerk of the Court (by CM/ECF & hand delivery)  
All counsel of record (by CM/ECF & e-mail)